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6 Attorneys for Plaintiffs,
7 WARNER BROS. RECORDS INC.;
8 VIRGIN RECORDS AMERICA, INC.;
9 BMG MUSIC; MAVERICK
10 RECORDINGS COMPANY;
INTERSCOPE RECORDS; SONY BMG
MUSIC ENTERTAINMENT; and ARISTA
RECORDS LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

13 WARNER BROS. RECORDS INC., a Delaware
1 corporation; VIRGIN RECORDS AMERICA,
2 INC., a California corporation; BMG MUSIC, a
3 New York general partnership; MAVERICK
4 RECORDINGS COMPANY, a California joint
5 venture; INTERSCOPE RECORDS, a California
6 general partnership; SONY BMG MUSIC
7 ENTERTAINMENT, a Delaware general
8 partnership; and ARISTA RECORDS LLC, a
9 Delaware limited liability company,
Plaintiffs.

9 ||

v.

2 YOO-MIN LEE,

Defendant.

CASE NO. C 07-03094 JCS

Honorable Joseph C. Spero

**STIPULATION TO CONTINUE CASE
MANAGEMENT CONFERENCE AND
EXTEND TIME FOR DEFENDANT TO
ANSWER PLAINTIFFS' COMPLAINT
AND [PROPOSED] ORDER**

1 Plaintiffs Warner Bros. Records, Inc., *et al.*, and Defendant Yoo-Min Lee (collectively, the
2 "Parties"), by and through their attorneys, stipulate to extend Defendant's time in which to answer
3 the First Amended Complaint to March 12, 2008. The Parties further stipulate, subject to the
4 Court's approval, to a continuance of the initial case management conference from March 21, 2008
5 at 1:30 p.m. to April 11, 2008, at 1:30 p.m. In support of their request, the Parties represent as
6 follows:

7 1. Plaintiffs filed their initial complaint for copyright infringement in this matter against
8 a John Doe defendant on June 13, 2007. On that date, Plaintiffs also filed their *Ex Parte* Application
9 for Leave to Take Immediate Discovery seeking leave of the Court to serve a Rule 45 subpoena on a
10 third-party Internet Service Provider ("ISP"). The Court entered an Order for Leave to take
11 Immediate Discovery on June 26, 2007, and Plaintiffs served a subpoena on the ISP. The ISP
12 provided Defendant's name in response to the subpoena.

13 2. Thereafter, the Parties engaged in periodic correspondence and discussions aimed at
14 resolving this case without further litigation. These discussions continued through February 7, 2008.
15 However, the Parties were unable to resolve the dispute. During that time, while the case was still in
16 the Doe stage, Plaintiffs requested two previous continuances of the case management conference,
17 which the Court granted by its Orders of September 12, 2007 and December 7, 2007.

18 3. On February 11, 2008, Plaintiffs filed the First Amended Complaint ("FAC") naming
19 Ms. Lee individually as the defendant, and Summons was issued. Defendant was served with the
20 Summons and FAC on February 14.

21 4. Defendant intends to file and serve an answer to the FAC, but desires additional time
22 in which to do so. Accordingly, the Parties have agreed to extend the deadline for Defendant to
23 answer the FAC to March 12, 2008. However, under the current case management schedule, the
24 Parties would be required to file a Joint Case Management Statement by March 14, just two days
25 after the Parties' agreed-upon deadline for Defendant to answer the FAC.

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1 5. Accordingly, the Parties have reached the following stipulation: (1) The parties agree
2 that the deadline for Defendant to answer the FAC be extended to March 12, 2008; (2) The parties
3 further agree that the initial case management conference be continued from March 21, 2008, at 1:30
4 p.m. to ~~April 11, 2008~~, at 1:30 p.m., with the Joint Case Management Statement to be filed by April
5 ~~11, 2008~~
4, 2008.

6 Dated: March 5, 2008

HOLME ROBERTS & OWEN LLP

7 By: 

8
9 MATTHEW FRANKLIN JAKSA
Attorney for Plaintiffs

10
11 Dated: March 5, 2008

12 GERALD SINGLETON, APC

13 By: 

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15 GERALD SINGLETON
16 Attorney for Defendants

17
18 Dated: March 6, 2008

19 By: 

20 IT IS SO ORDERED
21 AS MODIFIED
22
23 Hon. Joseph C. Spero
24 United States District Court
25 Northern District of California
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